

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

FELICIA SANDERS, individually and as
Legal Custodian of K.M., a minor,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

CA No. 2:16-cv-2356-RMG

consolidated with 2:16-cv-2350; 2:16-cv-2351; 2:16-cv-2352; 2:16-cv-2354; 2:16-cv-2355; 2:16-cv-2357; 2:16-cv-2358; 2:16-cv-2359; 2:16-cv-2360; 2:16-cv-2405; 2:16-cv-2406; 2:16-cv-2407; 2:16-cv-2409; and 2:16-cv-2746

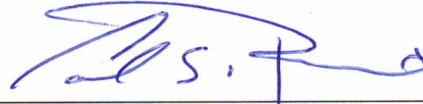
AFFIDAVIT

This document pertains to all cases

Personally appeared before me the undersigned who being duly sworn, deposes and states that:


1. I am a licensed attorney in South Carolina practicing with the firm of Pierce, Sloan, Kennedy & Early, LLC where I serve as the senior partner of thirteen attorneys.
2. At the request of the attorneys in the consolidated matter before Judge Gergel, I have been asked to truthfully and accurately describe the facts discussed herein.
3. Our firm represents the plaintiff in the case of *Simmons v. The United States of America*, Case No.: 2:16-cv-02378-DCN. I am the lead attorney for the *Simmons* case, which was transferred to Judge Norton by Order dated December 5, 2019.
4. Robert Richard Gergel is the son of U.S. District Judge Richard Gergel and is an attorney employed by our firm, joining our firm on September 9, 2019.

5. After the *Simmons* case was transferred to Judge Norton, and in light of the current issues before this Court, Robert Richard Gergel has engaged only in limited discussions concerning the current status and potential direction of the case.
6. If the firm is successful in this litigation the revenue of our firm will be increased. Part of this revenue will be used to provide annual bonuses to firm partners, associates and employees. Robert Richard Gergel would receive a portion of these bonuses.
7. Joe Wilson, who has previously done much of the legal research and brief writing regarding the *Simmons* case, is no longer a member of our firm. One of the reasons Robert Richard Gergel was hired was that he was an excellent candidate to perform complicated legal research and analysis along with associated brief writing.



Carl E. Pierce, II

SWORN to and SUBSCRIBED before me
this 14 day of January, 2020



Notary Public for South Carolina

My commission expires: 3/31/2021